

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re: Equifax Customer
Data Security Breach Litigation

This Document Relates To:

Commonwealth of Puerto Rico, Plaintiff,

v.

Equifax, Inc., Defendant.

MDL Docket No. 2800

No. 1:17-md-2800-TWT

Case No. 1:18-cv-5611

Chief Judge Thomas W. Thrash, Jr.

DECLARATION OF KYLE G. BATES

I, Kyle G. Bates, declare as follows:

1. I am an attorney duly licensed to practice law in all courts of the State of California and am admitted to practice law *pro hac vice* before this Court in connection with the above-captioned matter.

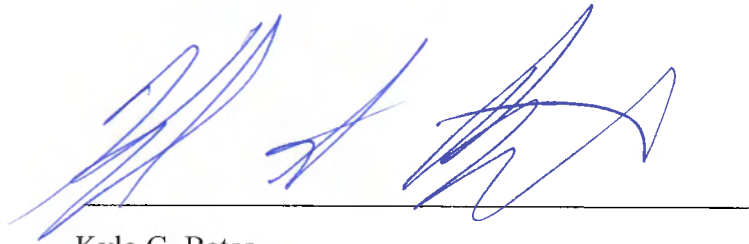
2. I am an attorney with the law firm of Schneider Wallace Cottrell Konecky Wotkins LLP, counsel for the Commonwealth of Puerto Rico in the above-captioned matter.

3. I submit this Declaration in support of Puerto Rico's Reply in Support of its Joinder with Chicago's Motion to Establish a Separate Track for Government Enforcement Actions. If called upon to testify as to the matters set forth in this Declaration, I could and would testify thereto.

4. On March 6, 2019, I corresponded by e-mail with counsel for the Consumer Plaintiffs in the above-captioned matter. The purpose of my e-mail was to seek to coordinate our efforts to pursue discovery on behalf of the Commonwealth of Puerto Rico, on the one hand, with the efforts of the Consumer Plaintiffs to pursue their own discovery, on the other.

5. On March 7, 2019 Norman Siegel, counsel for the Consumer Plaintiffs, replied to my e-mail on their behalf. A true and correct copy of my e-mail and Mr. Siegel's reply is attached hereto as **Exhibit 1**.

I declare under penalty of perjury pursuant to the laws of the United States and the State of California that the foregoing is true and correct. Executed this 22nd day of March, 2019, at Emeryville, California.

A handwritten signature in blue ink, consisting of stylized, overlapping loops and strokes, positioned above a horizontal line.

Kyle G. Bates
Counsel for the Commonwealth of Puerto Rico